



Mr. Sam Chummar
Remedial Project Manager
USEPA Region 5
Superfund Division
Remedial Response Section #1
77 W. Jackson Blvd. (SR-6J)
Chicago, IL 60604

Subject:

Kalamazoo Mill and Former Hawthorne Mill Time Critical Removal Action Quarterly Site Control Inspection Report #2

Dear Mr. Chummar:

Attached is the second quarterly post-removal site control inspection report for the Time Critical Removal Action (TCRA) at the Georgia-Pacific Corporation (Georgia-Pacific) Kalamazoo Mill Property and the former Hawthorne Mill Property (collectively referred to as the Mill Properties) and the affiliated consolidation areas. The Mill Properties are associated with the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site. This report has been prepared pursuant to the Administrative Settlement Agreement and Order on Consent (AOC), Docket No. V-W-'07-C-858. Pursuant to your request, the schedule for the quarterly post-removal site control inspection report has been adjusted to calendar quarters; therefore, this report covers activities from November 12, 2007 through March 31, 2008. In addition, the information previously provided in the monthly progress reports submitted as part of the TCRA activities will now be included in the quarterly post-removal site control inspection reports.

For any questions regarding details of this letter, please feel free to contact me.

Sincerely,

ARCADIS

Patrick N. McGuire
Principal

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INDUSTRIAL

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Imagine the result

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I. Work Completed During Quarter**Actions Performed**

- A Post-Removal Inspection was conducted on February 5, 2008, which cover field inspections of the Refuse Area, Oxbow Area (at the former Hawthorne Mill Property), and A-Site. The inspections were documented on the Post Removal Inspection Forms and in photographs taken during the inspection activities (Attachments 1 and 2, respectively) and are summarized below.
 - The documentation indicates that all of the inspected areas are snow covered. There are no indications of bank erosion or rip rap instability at the Refuse Area. The photographs suggest vegetation within the inspected areas appears to be stressed due to seasonal conditions.
 - The documentation indicates that the gates and fences around A-Site and the Refuse Area are currently in acceptable condition. In addition, the signs at the Refuse Area were documented as being maintained.
 - Site access roads are satisfactorily maintained for the A-Site. As shown in the photographic log in Attachment 2, the temporary cover system remains intact and shows no signs of erosion.
- Precipitation data from the Kalamazoo Airport was monitored at least once per week on the Weather Underground website (<http://www.wunderground.com/>). No 5-year, 24-hour (i.e., 3.4 inches/24 hours) rainfall events were observed during this reporting period. Data tables summarizing the daily precipitation measured at the Kalamazoo Airport are provided in Attachment 3.
- The Draft Final Report was revised pursuant to the USEPA's January 11, 2008 comments and resubmitted to the USEPA on February 6, 2008.

II. Schedule of Actions to be Performed

- The tentative date for the next quarterly site inspection is May 14, 2008.
- The Final Report will be finalized and submitted to USEPA.
- An updated schedule for the 5 years of Post-Removal Activities is provided as Attachment 4.

Attachment 1

Post-Removal Inspection Forms

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A-site

Georgia-Pacific Corporation
Time Critical Removal Action
Refuse Area at the Kalamazoo Property and
Oxbow Area at the Former Hawthorne Mill Property
Post-Removal Inspection Form

A-Site

Inspection Date: 2-5-08

Weather Conditions: 36° cloudy

Inspectors: Rich Anson

Time Arrived: 8:00 (AM/PM)

Time Departed: 9:00 (AM/PM)

Inspection Item	Visual	Instrument	Notes
A. Site Access Road			
• Erosion/Washout/Settlement	✓		
• Sufficient Gravel	✓		
B. Site Security			
• Access Gates	✓		
• Fence Integrity	✓		
• Signs	✓		
• Locks	✓		
C. A-Site Temporary Cover System			
• Bare Spots	✓		
• Stressed Vegetation	✓		
• Cracks	✓		
• Burrowing Animals	✓		
• Erosion	✓		
• Settlement	✓		
• Water Ponding	✓		
• Protruding Objects	✓		
• Undesirable Growth	✓		
• Slope Movement	✓		
D. Sheetpile Wall			

*Georgia-Pacific Corporation
Time Critical Removal Action
Refuse Area at the Kalamazoo Property and
Oxbow Area at the Former Hawthorne Mill Property
Post-Removal Inspection Form*

Inspected Items	Bank Condition		Comments
	Satisfactory	Unsatisfactory	
• Erosion Subsidence or Cracking of Soils Behind Wall	✓		
• Wall Joints	✓		
• Overall Wall Stability	✓		
E. Refuse and Oxbow Areas Slope Protection System			
• Bank Erosion			N/A
• Rip Rap Revetment			N/A
• Stressed Vegetation			N/A
• Bare Spots			N/A
I. Overall Site Appearance			Looked OKAY/LOT OF SNOW COVERING SITE

Comments/Proposed Action Items:

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Refuse Area

Georgia-Pacific Corporation
Time Critical Removal Action
Refuse Area at the Kalamazoo Property and
Oxbow Area at the Former Hawthorne Mill Property
Post-Removal Inspection Form

Inspection Date: 2-5-08

Weather Conditions:

Inspectors: Rich Anson

38° Cloudy

Time Arrived: 10:15 (AM/PM)

Time Departed: 11:00 (AM/PM)

Inspection Items	Site Access Road	Site Security	Site Temporary Cover System	Sheetpile Wall
A. Site Access Road				
• Erosion/Washout/Settlement	✓			
• Sufficient Gravel	✓			
B. Site Security				
• Access Gates	✓			
• Fence Integrity	✓			
• Signs	✓			
• Locks	✓			
C. A-Site Temporary Cover System				
• Bare Spots	✓			
• Stressed Vegetation	✓			
• Cracks	✓			
• Burrowing Animals	✓			
• Erosion	✓			
• Settlement	✓			
• Water Ponding	✓			
• Protruding Objects	✓			
• Undesirable Growth	✓			
• Slope Movement	✓			
D. Sheetpile Wall				

Road runs into crushed concrete from old buildings now

Georgia-Pacific Corporation
Time Critical Removal Action
Refuse Area at the Kalamazoo Property and
Oxbow Area at the Former Hawthorne Mill Property
Post-Removal Inspection Form

Inspection Items	Item Condition		Comments
	Satisfactory	Unsatisfactory	
• Erosion Subsidence or Cracking of Soils Behind Wall			N/A
• Wall Joints			N/A
• Overall Wall Stability			N/A
E. Refuse and Oxbow Areas Slope Protection System			
• Bank Erosion	✓		
• Rip Rap Revetment	✓		
• Stressed Vegetation	✓		
• Bare Spots	✓		
I. Overall Site Appearance			Looked okay - lot of snow covering site.

Comments/Proposed Action Items:

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Oxbow Area

Georgia-Pacific Corporation
Time Critical Removal Action
Refuse Area at the Kalamazoo Property and
Oxbow Area at the Former Hawthorne Mill Property
Post-Removal Inspection Form

Inspection Date: 2-5-08

Weather Conditions:

Inspectors: Rich ANSON

36° cloudy

Time Arrived: 9:15 (AM/PM)

Time Departed: 10:00 (AM/PM)

Inspection Items		Current Condition	
		Good	Bad
A. Site Access Road			
• Erosion/Washout/Settlement			N/A
• Sufficient Gravel			N/A
B. Site Security			
• Access Gates			N/A
• Fence Integrity			N/A
• Signs	✓		
• Locks			N/A
C. A-Site Temporary Cover System			
• Bare Spots	✓		
• Stressed Vegetation	✓		
• Cracks	✓		
• Burrowing Animals	✓		
• Erosion	✓		
• Settlement	✓		
• Water Ponding	✓		
• Protruding Objects	✓		
• Undesirable Growth	✓		
• Slope Movement	✓		
D. Sheetpile Wall			
			N/A

Georgia-Pacific Corporation
Time Critical Removal Action
Refuse Area at the Kalamazoo Property and
Oxbow Area at the Former Hawthorne Mill Property
Post-Removal Inspection Form

Inspection Items	Condition		Comments
	Satisfactory	Unsatisfactory	
• Erosion Subsidence or Cracking of Soils Behind Wall			N/A
• Wall Joints			N/A
• Overall Wall Stability			N/A
E. Refuse and Oxbow Areas Slope Protection System			
• Bank Erosion	✓		
• Rip Rap Revetment	✓		
• Stressed Vegetation	✓		
• Bare Spots	✓		
I. Overall Site Appearance			Looked OKAY - Lot of snow covering site

Comments/Proposed Action Items:

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Attachment 2

Photographic Log

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A-site

Georgia-Pacific Time Critical Removal Action Quarterly Site Inspection Report
Attachment 2
A-Site Photographic Log



February 2007- Temporary cover at A-Site planted with shallow-rooted grasses



May 2007- A-Site post remedial activities

Georgia-Pacific Time Critical Removal Action Quarterly Site Inspection Report
Attachment 2
A-Site Photographic Log



November 11, 2007- Vegetative layer on the temporary cover at A-Site



February 5, 2008- Snow covered vegetative layer on the temporary cover at A-Site

Georgia-Pacific Time Critical Removal Action Quarterly Site Inspection Report

Attachment 2

A-Site Photographic Log



February 5, 2008- Snow covered vegetative layer on the temporary cover at A-Site

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Refuse Area

Georgia-Pacific Time Critical Removal Action Quarterly Site Inspection Report
Attachment 2
Refuse Area Photographic Log



May 2007- Refuse Area post remedial activities



November 11, 2007- Vegetative cover at the Refuse Area

Georgia-Pacific Time Critical Removal Action Quarterly Site Inspection Report

Attachment 2

Refuse Area Photographic Log



November 11, 2007- Layer of riprap at the Refuse Area along the Kalamazoo River



February 5, 2008- Snow covered vegetative layer at the Refuse Area

Georgia-Pacific Time Critical Removal Action Quarterly Site Inspection Report

Attachment 2

Refuse Area Photographic Log



February 5, 2008- Snow covered layer of riprap at the Refuse Area along the Kalamazoo River



February 5, 2008- Snow covered layer of riprap at the Refuse Area along the Kalamazoo River

Georgia-Pacific Time Critical Removal Action Quarterly Site Inspection Report
Attachment 2
Refuse Area Photographic Log



February 5, 2008- Snow covered layer of riprap at the Refuse Area along the Kalamazoo River



February 5, 2008- Snow covered layer of riprap at the Refuse Area along the Kalamazoo River

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Oxbow Area

Georgia-Pacific Time Critical Removal Action Quarterly Site Inspection Report
Attachment 2
Oxbow Area Photographic Log



May 2007- Oxbow Area post removal activities



November 11, 2007- Vegetative cover at the Oxbow Area

Georgia-Pacific Time Critical Removal Action Quarterly Site Inspection Report
Attachment 2
Oxbow Area Photographic Log



November 11, 2007- Vegetative cover at the Oxbow Area



February 5, 2008- Snow covered vegetative layer at the Oxbow Area

Georgia-Pacific Time Critical Removal Action Quarterly Site Inspection Report

Attachment 2

Oxbow Area Photographic Log



February 5, 2008- Snow covered vegetative layer at the Oxbow Area

Attachment 3

Precipitation Data Tables

Georgia Pacific Time Critical Removal Action Quarterly Inspection

Attachment 3

Precipitation Data Table

Date	Precipitation Sum (in)
11/12/2007	0.01
11/13/2007	0
11/14/2007	0.01
11/15/2007	0.1
11/16/2007	0
11/17/2007	0.04
11/18/2007	0
11/19/2007	0
11/20/2007	0.05
11/21/2007	1.2
11/22/2007	0.02
11/23/2007	0
11/24/2007	0
11/25/2007	0.04
11/26/2007	0.14
11/27/2007	0
11/28/2007	0
11/29/2007	0
11/30/2007	0

Georgia Pacific Time Critical Removal Action Quarterly Inspection

Attachment 3

Precipitation Data Table

Date	Precipitation Sum (in)
12/1/2007	0.19
12/2/2007	0.41
12/3/2007	0.01
12/4/2007	0.01
12/5/2007	0.04
12/6/2007	0
12/7/2007	0.02
12/8/2007	0.01
12/9/2007	0
12/10/2007	0
12/11/2007	0.5
12/12/2007	0.01
12/13/2007	0.01
12/14/2007	0
12/15/2007	0.05
12/16/2007	0.02
12/17/2007	0
12/18/2007	0
12/19/2007	0
12/20/2007	0
12/21/2007	0
12/22/2007	0
12/23/2007	0.17
12/24/2007	0
12/25/2007	0
12/26/2007	0
12/27/2007	0
12/28/2007	0.19
12/29/2007	0
12/30/2007	0
12/31/2007	0.08

Georgia Pacific Time Critical Removal Action Quarterly Inspection

Attachment 3

Precipitation Data Table

Date	Precipitation Sum (in)
1/1/2008	0.16
1/2/2008	0.02
1/3/2008	0
1/4/2008	0
1/5/2008	0.01
1/6/2008	0
1/7/2008	0.59
1/8/2008	1.11
1/9/2008	0.02
1/10/2008	0.26
1/11/2008	0.08
1/12/2008	0
1/13/2008	0.37
1/14/2008	0.01
1/15/2008	0.04
1/16/2008	0
1/17/2008	0
1/18/2008	0
1/19/2008	0
1/20/2008	0
1/21/2008	0.01
1/22/2008	0.01
1/23/2008	0
1/24/2008	0
1/25/2008	0
1/26/2008	0.05
1/27/2008	0
1/28/2008	0.1
1/29/2008	0.48
1/30/2008	0
1/31/2008	0.01

Georgia Pacific Time Critical Removal Action Quarterly Inspection

Attachment 3

Precipitation Data Table

Date	Precipitation Sum (in)
2/1/2008	0.19
2/2/2008	0
2/3/2008	0
2/4/2008	0.12
2/5/2008	0.29
2/6/2008	0.54
2/7/2008	0.01
2/8/2008	0
2/9/2008	0.09
2/10/2008	0
2/11/2008	0
2/12/2008	0.06
2/13/2008	0
2/14/2008	0
2/15/2008	0
2/16/2008	0
2/17/2008	0.79
2/18/2008	0.01
2/19/2008	0
2/20/2008	0
2/21/2008	0
2/22/2008	0
2/23/2008	0
2/24/2008	0
2/25/2008	0.09
2/26/2008	0.04
2/27/2008	0
2/28/2008	0
2/29/2008	0.14

Georgia Pacific Time Critical Removal Action Quarterly Inspection

Attachment 3

Precipitation Data Table

Date	Precipitation Sum (in)
3/1/2008	0
3/2/2008	0
3/3/2008	0.15
3/4/2008	0
3/5/2008	0
3/6/2008	0
3/7/2008	0
3/8/2008	0
3/9/2008	0
3/10/2008	0
3/11/2008	0
3/12/2008	0
3/13/2008	0
3/14/2008	0
3/15/2008	0
3/16/2008	0
3/17/2008	0.06
3/18/2008	0.1
3/19/2008	0.02
3/20/2008	0
3/21/2008	0.68
3/22/2008	0.01
3/23/2008	0
3/24/2008	0
3/25/2008	0
3/26/2008	0
3/27/2008	0.29
3/28/2008	0
3/29/2008	0
3/30/2008	0.01
3/31/2008	0.55

Attachment 4

Updated Schedule

Georgia-Pacific Time Critical Removal Action Quarterly Site Inspection Report

Attachment 4

Schedule for Post-Removal Activities

Report	Reporting Period	Inspection Date	Reporting Date
2	November 2007-- March 2008	2/5/2008	4/30/2008
3	April 2008--June 2008	5/14/2008	7/31/2008
4	July 2008--September 2008	8/13/2008	10/31/2008
5	October 2008--December 2008	11/12/2008	1/31/2009
6	January 2009--March 2009	2/11/2009	4/30/2009
7	April 2009--June 2009	5/13/2009	7/31/2009
8	July 2009--September 2009	8/12/2009	10/31/2009
9	October 2009--December 2009	11/11/2009	1/31/2010
10	January 2010--March 2010	2/10/2010	4/30/2010
11	April 2010--June 2010	5/12/2010	7/31/2010
12	July 2010--September 2010	8/11/2010	10/31/2010
13	October 2010--December 2010	11/10/2010	1/31/2011
14	January 2011--March 2011	2/9/2011	4/30/2011
15	April 2011--June 2011	5/11/2011	7/31/2011
16	July 2011--September 2011	8/10/2011	10/31/2011
17	October 2011--December 2011	11/9/2011	1/31/2012
18	January 2012--March 2012	2/8/2012	4/30/2012
19	April 2012--June 2012	5/9/2012	7/31/2012
20	July 2012--September 2012	8/8/2012	10/31/2012
21	October 2012--December 2012	11/14/2012	1/31/2013

Notes:

1. Quarterly reports will now be submitted for calendar quarterly periods one month after the last day of each period. Inspections will occur the second Wednesday of the second month within an inspection period.
2. In addition to the third Quarterly Report, an evaluation of the establishment of vegetation at the Mill Properties will be conducted to confirm the discontinuance of maintaining erosion and sedimentation controls, including rip rap.
3. Region 5 of the United States Environmental Protection Agency (USEPA) and the Michigan Department of Environmental Quality (MDEQ) will be notified of each Quarterly Inspection 1 month prior to each inspection.
4. Notification of any unscheduled inspections that are required to be conducted due to weather conditions will be made to the USEPA and MDEQ as soon as possible.
5. The USEPA Region 5 and MDEQ will be notified of any deficiencies within 24 hours of discovery.